

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

LA UNIÓN DEL PUEBLO ENTERO, et al.,

Plaintiffs,

v.

TEXAS, et al.,

Defendants.

Civil Action No. 5:21-cv-844(XR)
(Consolidated Case)

OCA-GREATER HOUSTON, LEAGUE
OF WOMEN VOTERS OF TEXAS,
REVUP-TEXAS, TEXAS
ORGANIZING PROJECT, and
WORKERS DEFENSE ACTION FUND,

Plaintiffs,

v.

TEXAS SECRETARY OF STATE JOHN
SCOTT, *in his official capacity*, TEXAS
ATTORNEY GENERAL KEN
PAXTON, *in his official capacity*,
HARRIS COUNTY ELECTIONS
ADMINISTRATOR ISABEL
LONGORIA, *in her official capacity*,
TRAVIS COUNTY CLERK REBECCA
GUERRERO, *in her official capacity*, HARRIS
COUNTY DISTRICT ATTORNEY KIM OGG, *in
her official capacity*, TRAVIS COUNTY
DISTRICT ATTORNEY JOSÉ GARZA, *in his
official capacity*,

Defendants.

1:21-cv-0780-XR

UNOPPOSED MOTION TO WITHDRAW TEXAS ORGANIZING PROJECT

Pursuant to Rule 21 of the Federal Rules of Civil Procedure, OCA-Greater Houston, League of Women Voters of Texas, REVUP-Texas, Texas Organizing Project, and Workers

Defense Action Fund (together, “the OCA-GH Plaintiffs”) move for the withdrawal of Texas Organizing Project as a party in this action. Counsel for the OCA-GH Plaintiffs have conferred with counsel for Defendants who have noticed an appearance in this action. All named Defendants—Defendant Garza, Defendant Guerrero, Defendant Longoria, Defendant Ogg, and the State Defendants—have indicated they do not oppose this motion. All other OCA-GH Plaintiffs will remain in this litigation.

Accordingly, the OCA-GH Plaintiffs respectfully request that this Court enter an order voluntarily withdrawing Texas Organizing Project, with prejudice, from this litigation.

Dated: April 13, 2022

Respectfully submitted,

/s/ Zachary Dolling

Mimi M.D. Marziani
Texas Bar No. 24091906
Hani Mirza
Texas Bar No. 24083512
Zachary Dolling
Texas Bar No. 24105809
Sarah Chen*
TEXAS CIVIL RIGHTS PROJECT
1405 Montopolis Drive
Austin, TX 78741
512-474-5073 (Telephone)
512-474-0726 (Facsimile)
mimi@texascivilrightsproject.org
hani@texascivilrightsproject.org
zachary@texascivilrightsproject.org
schen@texascivilrightsproject.org

Thomas Buser-Clancy
Texas Bar No. 24078344
Savannah Kumar
Texas Bar No. 24120098
Ashley Harris
Texas Bar No. 24123238
Andre Segura

Texas Bar No. 24107112
ACLU FOUNDATION OF TEXAS, INC.
5225 Katy Freeway, Suite 350
Houston, TX 77007
Telephone: (713) 942-8146
Fax: (915) 642-6752
tbuser-clancy@aclutx.org
skumar@aclutx.org
aharris@aclutx.org
asegura@aclutx.org

Adriel I. Cepeda Derieux*
Ari Savitzky*
Sophia Lin Lakin*
Samantha Osaki*
Susan Mizner*
**AMERICAN CIVIL LIBERTIES UNION
FOUNDATION**
125 Broad St., 18th Floor
New York, NY 10004
(212) 284-7334
acepedaderieux@aclu.org
asavitzky@aclu.org
slakin@aclu.org
sosaki@aclu.org
smizner@aclu.org
**AMERICAN CIVIL LIBERTIES UNION
FOUNDATION**
39 Drumm St.
San Francisco, CA 94111
(415) 343-0781 (phone)

LIA SIFUENTES DAVIS
Texas State Bar No. 24071411
LUCIA ROMANO
Texas State Bar No. 24033013
DISABILITY RIGHTS TEXAS
2222 West Braker Lane
Austin, Texas 78758-1024
(512) 454-4816 (phone)
(512) 454-3999 (fax)
ldavis@drtx.org
lromano@drtx.org

Jerry Vattamala*

Susana Lorenzo-Giguere*
Patrick Stegemoeller*
**ASIAN AMERICAN LEGAL DEFENSE
AND EDUCATION FUND**
99 Hudson Street, 12th Floor
New York, NY 10013
(212) 966-5932 (phone)
(212) 966 4303 (fax)
jvattamala@aaldef.org
slorenzo-giguere@aaldef.org
pstegemoeller@aaldef.org

Jessica Ring Amunson*
Urja Mittal*
JENNER & BLOCK LLP
1099 New York Ave. NW, Suite 900
Washington, DC 20001
(202) 639-6000
jamunson@jenner.com
umittal@jenner.com

Sophia Cai*
JENNER & BLOCK LLP
455 Market St. Suite 2100
San Francisco, CA 94105
scai@jenner.com

**COUNSEL FOR PLAINTIFFS OCA-
GREATER HOUSTON, ET AL.**

*Admitted pro hac vice

CERTIFICATE OF SERVICE

By my signature below, I certify that a true and correct copy of the foregoing has been served on all counsel of record on April 13, 2022, through the Electronic Case File System of the Western District of Texas.

/s/ Zachary Dolling

CERTIFICATE OF CONFERENCE

I certify that between March 30, 2022, and April 6, 2022, the OCA-GH Plaintiffs' counsel conferred via e-mail with counsel for each Defendant, none of whom are opposed to the motion to withdraw requested here.

/s/ Zachary Dolling